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July 30, 2008

Via First Class Mail and Facsimile 312-364-1003

Martin McManaman
Lowis & Gellen, LLP
200 West Adams, Suite 1900
Chicago, Illinois 60606

Re: Douglas Nash v. County of Will, et. al.
Case No.: 08-C-1170

Dear Mr. McManaman:

I am writing regarding Defendants' written discovery responses. Our requests were served on Defendants on April 23rd and we have not yet received responses to these requests, nor have we received discovery requests from the Defendants. I have been attempting to resolve this issue with you since late June, and the deadline we agreed upon, as confirmed by my July 8, 2008 letter was July 22, 2008. To date, I have only received your Rule 26(a)(1) disclosures. Your phone message for me last week stated that you would be delivering Defendants' responses to our office by Tuesday, July 29, 2008 at the latest. I continue to await these responses. We have not been able to move forward with Defendants' depositions, already noticed and subsequently cancelled by my office due to your outstanding discovery responses. We have been more than reasonable in our attempts to accommodate you, but it is necessary that this case proceed. As such, if we do not receive Defendants' discovery responses by the noon tomorrow, Thursday, July 31, 2008, I will have no choice but to file a motion to compel. Please also find enclosed another notice of deposition for the defendants and a revised settlement demand letter correcting an inaccuracy and including information that was inadvertently not incorporated.

If you have any questions, please contact our office.

Respectfully yours,

Ronak Patel
Ronak Patel

PLAINTIFF'S
EXHIBIT

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